

**PUBLIC FILE**

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**IMPORTER GENERAL SUBMISSION**

**FROM**

**WILLIAM ENTERPRISE GROUP PTY. LTD  
AND  
WILLIAM ENTERPRISE TRADING PTY. LTD**

**REGARDING**

**INVESTIGATION INTO THE ALLEGED DUMPING OF  
HOLLOW STRUCTURAL SECTIONS (HSS) EXPORTED FROM THE PEOPLE'S  
REPUBLIC OF CHINA (CHINA, THE REPUBLIC OF KOREA (KOREA), MALAYSIA,  
TAIWAI AND THE KINGDOM OF THAILAND (THAILAND)**

**AND**

**INVESTIGATION INTO THE ALLEGED SUBSIDISATION OF  
HSS EXPORTED FROM CHINA  
(INVESTIGATION NO. 177)**

**Importer(s) self introduction**

Willaim Enterprise Group Pty. Ltd (ABN 51 140 040 419 hereinafter referred to as the 'WEG') was registered in ASIC on 16<sup>th</sup> October, 2009, the company imports HSS and other steel products such as fence panels from China, while the certain HSS fall in the scope of this investigation. The company sells the abovementioned imported products, with other locally procured products, to Australian domestic market

Willaim Enterprise Trading Pty. Ltd (ABN 38 145 419 236 hereinafter referred to as the 'WET') was registered in ASIC on 26<sup>th</sup> July, 2010, the company imports HSS and other steel products such as fence panels from China, while the certain HSS fall in the scope of this investigation. The company sells the abovementioned imported products, with other locally procured products, to Australian domestic market

**Response**

1. For the mentioned investigation mentioned in the report no.177, WEG and WET cooperated the custom and welcome the result that 'the Minister accepted this recommendation and the measures were subsequently revoked' for the 2009/2010 review. We share China government's concern regarding the time gap between the 2009/2010 review and this investigation. The time gap is shorter than half year between the revoke decision was made and the initialization of this investigation, which brought great burden to Australian HSS importers and China's HSS exporters in terms of preparing documents and cooperation for the investigation. We hope the frequency of the investigation can be more reasonable and longer if possible
2. We imports HSS from two China's exporters. Both of them are private enterprise without shareholding owned or controlled by China's government or any public body. To the knowledge and information we have, the two exporters exports HSS to us (Australian market) are due to the pure intention or motivation that they can make more money via that compared within China's domestic market. The management of the two China's exporters notified us that they are facing fierce competition in China and the profit calculation and facts told them that export is more profitable than domestic sales. We reckon the statement of our acknowledgement of the abovementioned facts are indirect evidence (with reasonable ground) demonstrating China's HSS market is full of normal competition, although probably China market, as a general one, is hard to be listed as a competitive market. And also, Australian market, for China's exporters, is a place making money rather than dumping their products with cheap price
3. We reckon the factors mentioned in the report, such as price of raw materials, state-owned enterprises' interference, are general ones and they already existed in China when the previous investigations were initiated and concluded. So that it is not appropriate to raise them as new evidences in this investigation. From the business

between our exporters in China and us, we did not find any clue about China's government or its state-owned enterprises' direct interference on the export price of the concerned HSS products

4. We strongly object using Japanese data as the normal price of China's exported HSS products. As everybody knows, Japan is a developed country with the high GDP per capita (top tier of the world). For various cost factors such as worker remuneration, transportation expenses, those of Japan are undoubtedly much higher than China's, and it is obvious that the reason we imported goods from China is just because China has competitiveness in terms of cost factors as a developing country. It is ridiculous to employ a developed country's data to model out a developing country's HSS normal price. Even if China's domestic selling price of HSS products are much lower than Australian producers' expectations, it is not proper at all to change the data source to a developed country, which has 10 times of GDP per capita of that of China
5. For subsidies, our exporter seldom received subsidy from government or any public body. As we know, maybe China's government listed aluminum and steel industries as 'pillar' industries, our exporters as private companies are seldom subsidized as a player of this industry.
6. As an Australian HSS market player, we did not feel strongly the negative effects of the global financial crises. The sales amount is increasing while the profitability kept the stable trend. So that we cannot agree that the Australian market are seriously affected by imports from China and other countries' exporters

#### **Conclusion**

Our exporters in China have no intention and practice to dump their products with lower price to Australian market. The two exporters are not interfered by China's government for its pricing or business operation, and the exporters are not materially subsidized financially by China's government or any public body for its export to us